



State of Utah

Department of
Environmental Quality

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Site ID: 10219

Title V Operating Permit

PERMIT NUMBER: 1300033002

DATE OF PERMIT: August 16, 2002

Date of Last Revision: May 31, 2006

This Operating Permit is issued to, and applies to the following:

Name of Permittee:

El Paso Field Operations Company
1001 Louisiana St.
Houston, TX 77046-0995

Permitted Location:

Bluebell Gas Plant
5000 West 5550 North
Roosevelt, UT 84066

UTM coordinates: 4,470,289 meters Northing, 577,604 meters Easting
SIC code: 1311

ABSTRACT

The Bluebell gas plant receives, compresses, and processes wellhead gas to make the following products: propane, butane, butane-natural gasoline, and pipeline natural gas. Bluebell is a major source of VOC and NO_x.

UTAH AIR QUALITY BOARD

By:

Richard W. Sprott, Executive Secretary

Prepared By:

Tim Andrus

Operating Permit History

6/16/1997 - Permit issued	Action initiated by an initial operating permit application	
8/20/1999 -Permit modified	Action initiated by an administrative amendment (initiated by DAQ)	to change the company name from Gary Williams Energy Corporation to Coastal Field Services Company
7/10/1998 -Permit modified	Action initiated by a reopening of an operating permit for cause	to incorporate changes that have been made to the inventory rule. Changes were also made to the opacity monitoring for natural gas burning units. The phrase "compliance will be assumed" has been replaced with the language suggested in EPA Region 8 letter Ref: 8P2-A.
8/16/2002 - Permit issued	Action initiated by a renewal of an operating permit	
5/31/2006 -Permit modified	Action initiated by an administrative amendment (initiated by source)	To change the annual compliance certification due date from 1/1/06 to 3/1/06. Brad Rogers of El Paso was advised by telephone that a certification must be submitted before 1/1/07 to meet the 12-month minimum requirement, then another certification for the remaining period would be required by 3/1/07.

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Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

Section I: General Provisions

I.A. Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

I.B. Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

I.C. Duty to Comply.

- I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))
- I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))
- I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))
- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D. Permit Expiration and Renewal.

I.D.1 This permit is issued for a fixed term of five years and expires on August 16, 2007. (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due by February 16, 2007. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E. Application Shield.

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F. Severability.

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G. Permit Fee.

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H. No Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I. Revision Exception.

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J. Inspection and Entry.

I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:

I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))

I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))

I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))

I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))

I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K. Certification.

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L. Compliance Certification.

I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than **March 1, 2007** and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))

I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;

I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;

I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.

I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Office of Enforcement, Compliance and Environmental Justice
(mail code 8ENF)
EPA, Region VIII
999 18th Street, Suite 300
Denver, CO 80202-2466

I.M. Permit Shield.

I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:

I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))

I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))

I.M.2 Nothing in this permit shall alter or affect any of the following:

I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))

I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))

I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

I.N. Emergency Provision.

I.N.1 An “emergency” is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))

I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))

I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))

I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))

I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))

I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))

I.O. Operational Flexibility.

Operational flexibility is governed by R307-415-7d(1).

I.P. Off-permit Changes.

Off-permit changes are governed by R307-415-7d(2).

I.Q. Administrative Permit Amendments.

Administrative permit amendments are governed by R307-415-7e.

I.R. Permit Modifications.

Permit modifications are governed by R307-415-7f.

I.S. **Records and Reporting.**

I.S.1 Records.

I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))

I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))

I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.

I.S.1.b.2 The date analyses were performed.

I.S.1.b.3 The company or entity that performed the analyses.

I.S.1.b.4 The analytical techniques or methods used.

I.S.1.b.5 The results of such analyses.

I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.

I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.

I.S.2 Reports.

I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))

I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))

I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. **Prompt, as used in this condition, shall be defined as written notification within 14 days.** Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))

I.S.3 Notification Addresses.

I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:

Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820
Phone: 801-536-4000

- I.S.3.b All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:

For annual compliance certifications

Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and
Environmental Justice (mail code 8ENF)
999 18th Street, Suite 300
Denver, CO 80202-2466

For reports, notifications, or other correspondence
related to permit modifications, applications, etc.

Environmental Protection Agency, Region VIII
Office of Partnerships & Regulatory Assistance
Air & Radiation Program (mail code 8P-AR)
999 18th Street, Suite 300
Denver, CO 80202-2466
Phone: 303-312-6440

I.T. Reopening for Cause.

- I.T.1 A permit shall be reopened and revised under any of the following circumstances:

I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))

I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))

I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))

I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))

I.T.2 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U. Inventory Requirements.

Emission inventories shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

Section II: SPECIAL PROVISIONS

II.A. Emission Unit(s) Permitted to Discharge Air Contaminants.

(R307-415-4(3)(a) and R307-415-4(4))

- II.A.1 **Reciprocating Driven IC Engine** (designated as 1)
 Unit Description: Pre-1969 compressor engine, 1100 hp, natural gas fired
- II.A.2 **Reciprocating Driven IC Engine** (designated as 2)
 Unit Description: Pre-1969 compressor engine, 1100 hp, natural gas fired
- II.A.3 **Reciprocating Driven IC Engine** (designated as 3)
 Unit Description: Pre-1969 compressor engine, 1100 hp, natural gas fired
- II.A.4 **Reciprocating Driven IC Engine** (designated as 4)
 Unit Description: Pre-1969 compressor engine, 1100 hp, natural gas fired
- II.A.5 **Reciprocating Driven IC Engine** (designated as 6)
 Unit Description: Pre-1969 compressor engine, 1100 hp, natural gas fired
- II.A.6 **Reciprocating Driven IC Engine** (designated as 7)
 Unit Description: Pre-1969 compressor engine, 1100 hp, natural gas fired
- II.A.7 **Hot Oil Heater** (designated as 9)
 Unit Description: Pre-1969, 12.50 MMBtu/hr furnace, natural gas fired
- II.A.8 **Glycol Reboiler** (designated as 11)
 Unit Description: Pre-1969, 500 MBtu/hr reboiler, natural gas fired
- II.A.9 **Glycol Reboiler** (designated as 12)
 Unit Description: Pre-1969, 500 MMBtu/hr reboiler, natural gas fired
- II.A.10 **Flare** (designated as 14)
 Unit Description: Emergency flare
- II.A.11 **Glycol Dehydration Process Vent** (designated as 15)
 Unit Description: Pre-1969 dehydration process vent for VOC's
- II.A.12 **Line Heater** (designated as 16)
 Unit Description: Approximately 0.250 MMBtu/hr. Listed for informational purposes.

II.B. Requirements and limitations.

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated: (R307-415-6a(1))

II.B.1 Conditions on permitted source (Source-wide)

II.B.1.a Condition:

A Risk Management Plan (RMP) developed in accordance with 40 CFR Part 68 shall be submitted to the United States Environmental Protection Agency not later than the applicable date in 40 CFR 68. [Authority granted under 40 CFR 68; condition originated in 40 CFR Part 68]

II.B.1.a.1 Monitoring:

Records required for this permit condition will serve as monitoring.

II.B.1.a.2 Recordkeeping:

A copy of the letter(s) of registration and submittal of the original RMP and any subsequent revisions to the RMP required by 40 CFR Part 68 shall be made available to the Executive Secretary upon request.

- II.B.1.a.3 **Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.1.b **Condition:**
- Visible emissions shall be no greater than 40 percent opacity unless otherwise specified in this permit. [Authority granted under R307-201-3; condition originated in R307-201-3]
- II.B.1.b.1 **Monitoring:**
- In lieu of monitoring via visible emission observations, fuel usage shall be monitored to demonstrate that only pipeline-quality natural gas is used as fuel.
- II.B.1.b.2 **Recordkeeping:**
- Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.
- II.B.1.b.3 **Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.2 **Conditions on Flare (14)**
- II.B.2.a **Condition:**
- Visible emissions shall be no greater than 20 percent opacity. [Authority granted under R307-201-3; condition originated in R307-201-3]
- II.B.2.a.1 **Monitoring:**
- In lieu of monitoring via visible emission observations, fuel usage shall be monitored to demonstrate that only pipeline-quality natural gas is used as fuel.
- II.B.2.a.2 **Recordkeeping:**
- Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.
- II.B.2.a.3 **Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.C. **Emissions Trading.**
- (R307-415-6a(10))
- Not applicable to this source.
- II.D. **Alternative Operating Scenarios.**
- (R307-415-6a(9))
- Not applicable to this source.

Section III: PERMIT SHIELD

The following requirements have been determined to be not applicable to this source in accordance with Provision I.M, Permit Shield:

III.A. 40 CFR, Part 60, Subpart LLL (NSPS/ SO₂ emissions, Natural Gas Plants)

This regulation is not applicable to the permitted source (Source-wide) because the sweetening unit was installed before January 20, 1984.

III.B. 40 CFR, Part 60, Subparts K, Ka, Kb (NSPS/ Volatile Organic Liquid Storage Vessels)

This regulation is not applicable to the permitted source (Source-wide) because the existing tanks were all constructed prior to June 11, 1973.

III.C. 40 CFR, Part 60, Subpart KKK (NSPS/ VOC leaks, Natural Gas Plants)

This regulation is not applicable to the permitted source (Source-wide) because none of the existing equipment has been modified, constructed, or reconstructed after January 20, 1984.

Section IV: ACID RAIN PROVISIONS.

This source is not subject to Title IV. This section is not applicable.

REVIEWER COMMENTS

1. Comment regarding permitted source (Source-wide)

Fugitive dust emissions: Monitoring of fugitive dust emissions is not included in this permit. Visible emissions violations from fugitive dust are not a concern since the roads leading to the source are all paved. [Comment last updated on 3/11/1997]

2. Comment on an item originating in 40 CFR 63, Subpart R regarding permitted source (Source-wide)

Applicability: The applicability of 40 CFR part 60, subpart R to this site has been investigated. The site doesn't meet the definition of a pipeline breakout station or the definition of gasoline bulk terminal. Therefore, Subpart R does not apply. This non-applicability determination has been confirmed by Stephen Shedd of the EPA. [Comment last updated on 10/17/1996]

3. Comment on an item originating in this permit regarding permitted source (Source-wide)

Change in annual certification due date: This date is being changed to match other El Paso sources. Brad Rogers informed by both Robert and myself that during the first year of this permit, two certifications must be submitted to avoid violating the 12-month submittal requirement. [Comment last updated on 5/12/2006]